

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:  
THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,

Plaintiff,

As representative of

THE COMMONWEALTH OF PUERTO  
RICO

Debtor<sup>1</sup>

CIVIL NO.: 17-BK-03283 (LTS)

PROMESA

TITLE III

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U.S. DISTRICT COURT  
SAN JUAN, P.R.

**RESPONSE AND RESERVATION OF RIGHTS IN OPPOSITION TO THE  
TWENTYTHIRD OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE  
COMMONWEALTH OF PUERTO RICO TO RESOLUTIONS OF ADDITIONAL  
AMENDMENT OF THE PROCEDURE OF CASE PROCESSING  
[ECF NO. 3804]**

**TO THE HONORABLE COURT:**

**COMES NOW** creditor **Mirta Méndez Hernández, OWN RIGHT**, and respectfully responds in opposition to the Twenty Third Omnibus Objection (Non Substantive) of the Commonwealth of Puerto Rico to Resolution of Additional Amendment of the procedure of case processing [ECF No. 3804] “the Objection”), and states and prays as follows:

1. The Commonwealth of Puerto Rico (“Debtor”) has objected to some of creditor

**Mirta Méndez Hernández’** timely filed proofs of claim as amendment.

2. **Mirta Méndez Hernández** has filed three proofs of claim pertaining to damages claimed on behalf of his children in the pending State Court case Rosa Lydia Vélez vs. ELA, KPE 1980-1738: Claim No. 37037 by itself and in representation of her granddaughter **REDACTED**, **REDACTED**, Claim No. 33542 on behalf of her granddaughter **REDACTED**.

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

**REDACTED** and Claim No. 27901 on behalf of her husband Julio Medina Figueroa, grandfather and guardian of the minor Naomi S. Maysonet Medina.

3. However, the claim filed by and for her granddaughter was subsequently amended by Claim No. 78355 only for the purpose of correcting her name to read: N.S.M.M.

4. That the claim that should or should have been dismissed is the Claim No. 33542, which was amended by Claim No. 78355 for the purpose of correcting the minor's name.


5. In Debtor's Objection No. 358, page 73, Prime Clerk Claim No. 37037, **Mirta Méndez Hernández**, moves the Court to deny Debtor's objection.

6. **Mirta Méndez Hernández** expressly reserves any rights in connection therewith and requests that, the non-substantive disallowance requested by Debtor should not prejudice **Mirta Méndez Hernández**'s rights and claims, which were and are expressly reserved.

RESPECTFULLY SUBMITTED.

In Mayaguez, Puerto Rico, on this 8th day of July 2019.

I HEREBY CERTIFY that on this same date that I have personally submitted and notified a true and accurate copy of the preceding document before the Clerk's Office, United States District Court #150 Chardon Avenue, Federal Building, San Juan, Puerto Rico 00918, and served a copy of the same via fax to Counsel for the Oversight Board and to the Creditors' Committee.

  
**Mirta Méndez Hernández**  
**Creditor**  
488 CALLE JUAN RODRIGUEZ  
BO. EL MANI  
MAYAGUEZ, PUERTO RICO 00680  
787-951-6379